

1 A. Yes. Ameritech Illinois is fully compliant with the FCC's order in allowing CLECs to
2 purchase their own splitter and install it in their collocation arrangement.

3 Q WHEN WILL THE SPLITTERS THAT AMERITECH ILLINOIS HAS
4 VOLUNTARILY AGREED TO OWN BE DEPLOYED IN THE "TARGETED"
5 WIRE CENTERS?

6 A. The deployment schedule for Ameritech Illinois' voluntary offer to own the splitter and
7 provide it on a line at a time basis has been developed and splitters are being installed
8 accordingly. All interested CLECs ranked, in order of preference, all the
9 central offices in Illinois where they wanted Ameritech Illinois to install splitters.
10 Ameritech Illinois did not set a ceiling on the number of offices the CLECs could rank.
11 The CLECs then submitted forecasts for those offices which were received by Ameritech
12 Illinois on March 23. Ameritech Illinois has published the deployment schedule, based
13 on the ranked offices and forecast. This Ameritech Illinois schedule provides that 48%
14 of the CLECs forecasted lines will be available by June 20th. While not every office will
15 be ready by June 6, Ameritech Illinois' schedule does provide the CLECs with all
16 targeted offices in the order they were requested. Hence, the percentage of lines
17 forecasted will be provided as follows: 27% by June 6th; 48% by June ²⁰27th; 83% by July
18 27th and 100% by August 20th, 2000.

19 Q. DOES THIS SPLITTER "ROLL OUT" SCHEDULE COMPLY WITH THE LINE
20 SHARING ORDER?

21 A. Yes. The schedule does not jeopardize compliance with the FCC's order, as CLECs have
22 always had the option of installing their own splitters. And, at no time did Ameritech
23 Illinois commit to providing splitters in all 141 of the requested central offices in Illinois

1 by June 6, 2000. Ameritech Illinois did not even have the forecasts from the CLECs until
2 March 22, 2000. All the central office engineering, ordering of the equipment, delivery
3 dates of the equipment, installation of the equipment and testing of the equipment had to
4 be planned and sequenced. This is the very reason why the CLECs were encouraged
5 repeatedly by Ameritech Illinois at the weekly line sharing meetings to provide their own
6 splitter functionality, as Rhythms chose to do, such that the CLECs could be operational
7 on June 6, 2000 in all of Ameritech Illinois central offices.

8 Orders were placed with vendors in early March and new vendors were solicited and
9 contracts signed with these vendors such that Ameritech Illinois could manage the 20-
10 week schedule that is provided. Ameritech Illinois has always advised the CLECs that
11 the deployment schedule would depend on receiving the orders for the cabling, blocks,
12 bays, shelves and splitter cards on time. If the raw materials are received on time, the
13 schedule, as requested, will be completed on time.

14 Q. RHYTHMS AND COVAD SUGGEST THAT THIS DEPLOYMENT SCHEDULE
15 IS THE WORST OF THE ILECS. (Covad Ex. 1.0 at 12(Moya)) HOW DO YOU
16 RESPOND?
17

18 A. Rhythms and Covad contend that all other ILECs across the country have all of the
19 CLECs requested offices completed and ready by the June 6th deadline. Ameritech
20 Illinois has been made aware of industry wide shortages of the following products:
21 Bays, splitter shelves, splitter cards, tie cabling and blocks. These shortages are

1 affecting all of the ILECs. In fact, Ameritech Illinois is aware that the other regions are
2 NOT going to meet their June 6th deadlines as provided by the ILECs to the CLECs and
3 this information was obtained through sworn testimony at the Texas Public Utility
4 Commission hearings on May 23, 2000. Nonetheless, the CLECs have signed
5 interconnection contracts in place with two of these ILECs. And, another ILEC is not
6 providing any ILEC owned splitters as an option to the CLECs. Ameritech Illinois'
7 parent company, SBC, signed letters of intent with the manufacturer of the splitters in
8 early March and because of SBCs early request, has been provided splitter shelves and
9 splitter cards and, short of backorders outside of Ameritech Illinois control, Ameritech
10 Illinois expects to honor the schedule as provided.

11
12 Q. WHAT STEPS HAS AMERITECH ILLINOIS TAKEN TO FACILITATE CLEC
13 DEPLOYMENT OF CLEC OWNED SPLITTERS?

14 A. Ameritech Illinois repeatedly urged CLECs purchasing their own splitters to submit
15 collocation requests (physical and virtual) to ensure that those CLECs could implement
16 line sharing in their targeted offices by June 6, 2000. While Ameritech Illinois worked
17 on its process for a "line sharing collocation application," Ameritech Illinois has
18 provided the CLECs with information necessary to submit standard applications which
19 Ameritech Illinois would honor. When the draft line sharing application became
20 available in early April, Ameritech Illinois also told the CLECs in the collaborative
21 session that Ameritech Illinois would accept the draft application. That application was
22 distributed electronically to all CLECs on April 7, 2000. On April 28, Ameritech Illinois

1 furnished all CLECs with its official Line Sharing Collocation Application streamlined
2 and tailored for line sharing. Ameritech Illinois also provided direction to the CLECs on
3 how to properly submit the applications for cable re-designations and inventory of
4 facilities in Ameritech Illinois database.

5 Also, Ameritech Illinois crafted a one time process , at the request and with the
6 agreement of the CLECs, to provide a 30 day interval for CLECS to submit collocation -
7 applications in those offices that the CLEC wished to reuse existing cabling to facilitate
8 their line sharing forecasts. Ameritech Illinois agreed to waive all collocation application
9 fees and will restencil and designate pairs in Ameritech Illinois "SWITCH" data base so
10 that the pre-provisioning of CLECs cable pairs would be inventoried in Ameritech
11 Illinois' data base to accomplish flow through provisioning.

12 V. AMERITECH ILLINOIS' PROPOSED AGREEMENT

13 Q. WHY SHOULD AMERITECH ILLINOIS' PROPOSED TERMS AND
14 CONDITIONS FOR LINE SHARING BE ADOPTED?

15 A. First, Ameritech Illinois' proposed line sharing agreement is consistent with the FCC's
16 *Line Sharing Order*. The CLEC's proposals go far beyond what is required by the FCC.
17 Second, Ameritech Illinois' proposal applies to all CLECs, including Ameritech Illinois'
18 data affiliate. This will ensure parity in the service provided by Ameritech Illinois to all
19 CLECs.

20
21 VI. COMMENTS ON THE RHYTHMS' AND COVAD'S PROPOSED AGREEMENT

22
23 Q. RHYTHMS AND COVAD HAVE OFFERED TERMS AND CONDITIONS TO

SUPPORT THEIR VIEW OF "LINE SHARING." DO YOU HAVE ANY CONCERNS WITH THESE PROPOSED TERMS AND CONDITIONS?

A. Yes. The proposed terms and conditions include many unreasonable items that are inconsistent with the *Line Sharing Order*, the framework developed during the Line Sharing Trial or with the current standards for provision of unbundled DSL capable loops. The Issues which I am concerned about and will address include:

- Issue 1: Should Ameritech Illinois be required to provide a menu of three splitter network configurations to address CLECs' differing business needs in all requesting central offices by June 6, 2000?
- Issue 3: Is thirty (30) calendar days the appropriate interval for augments to provide line sharing?
- Issue 4: Should Ameritech Illinois be required to provide CLECs with direct access to the shared physical loop for testing purposes at any technically feasible point?
- Issue 5: Should Ameritech Illinois be required to provide the Line Sharing UNE in a three business day interval from June 6 to September 6, in a two day business interval from September 7 to December 7, and in a one day business interval thereafter and a five business day interval for loops that require de-conditioning?
- Issue 7: In addition to providing line sharing over home run copper loops, must Ameritech Illinois also allow CLECs to provide xDSL services utilizing line sharing on loops that traverse fiber-fed digital loop carrier ("DLC") systems between the remote terminal and the central office?
- Issue 9: In order to consider the installation of the line sharing UNE complete, must Ameritech Illinois test and the CLEC affirmatively accept the line sharing UNE?
- Issue 10: What is the appropriate maintenance and repair time interval?
- Issue 11: Should Ameritech Illinois pay for the cable that carries voice traffic from the CLEC's splitter back to Ameritech Illinois' main distribution frame (MDF)?

1 ISSUE 1:

2 Q. DESCRIBE AMERITECH ILLINOIS' CONCERN OVER RHYTHMS AND
3 COVAD'S MENU APPROACH.
4

5 I set forth Ameritech Illinois' proposal on splitter configuration above. I would like to
6 elaborate, however, on the several reasons why Ameritech Illinois objects to the "menu"
7 approach advocated by Covad and Rhythms. As stated above, Ameritech Illinois
8 disagrees with Rhythms' and Covad's contention that Ameritech Illinois will not be in
9 compliance with the FCC's *Line Sharing Order* if it does not offer splitter functionality
10 to CLECs. The *Line Sharing Order* does not require Ameritech Illinois to own splitters
11 or to provide splitter functionality to CLECs by June 6, 2000, or any other time.

12 Q. RHYTHMS' AND COVAD'S, HOWEVER, CLAIM THAT THIS IS A
13 MISLEADING INTERPRETATION. THEY ARGUE THAT THE FCC'S
14 LANGUAGE WAS IN RESPONSE TO ILEC'S FEAR THAT SOME CLECS
15 MIGHT DEMAND TO OWN AND CONTROL THE SPLITTER, THEREFORE,
16 THE FCC WAS "SIMPLY MAKING IT CLEAR THAT THE ILEC COULD
17 FORCE THE CLEC TO ALLOW THE ILEC TO OWN THE SPLITTER." HOW
18 DO YOU RESPOND? (Covad Ex. 2.0 at 16-17 (Zulevic))
19

20 A. Nothing in the record supports the CLECs conclusions. In fact, in both the California
21 and Texas Arbitration Proceedings held in April and May of this year, the CLECs have
22 argued that SBC changed its view of splitter ownership. In fact, in both of these
23 proceedings, the CLECs have introduced into record SBC's letter filed with the FCC in
24 June of 1999. SBC has well acknowledged in both of these proceedings that it was
25 apparent that the FCC awarded the CLECs the "right" to full ownership and maintenance
26 of splitters and as such, SBC can no longer assert their previous position. Also,
27 advances have been introduced in the splitter technology allowing voice services to not

1 be interrupted when splitter cards are removed or become defective. Such innovations
2 allow for the protection of the end user's lifeline service. These measures coupled with
3 the liability language that Ameritech Illinois is requesting, should assure that end user's
4 voice service will remain uninterrupted and secure under a line shared service.

5
6 Q. DOES AMERITECH ILLINOIS HAVE OTHER OBJECTIONS TO RHYTHMS'
7 AND COVAD'S "MENU" APPROACH?

8
9 Yes. Ameritech Illinois objects to Rhythms and Covads contention that Ameritech
10 Illinois must provide splitters on a "shelf at a time basis." As stated above, not only is
11 Ameritech Illinois not required by the *Line Sharing Order* to provide splitters a shelf at a
12 time, there are many restrictions which now prevent Ameritech Illinois from providing
13 splitters a shelf at a time.

14 Q. RHYTHMS AND COVAD, HOWEVER, ARGUE THAT OFFERING SPLITTERS
15 A SHELF AT A TIME IS MORE EFFICIENT. HOW DO YOU RESPOND?
16 (Covad Ex. 2.0 at 8 (Zulevic))
17

18 A. Setting aside the provisioning problems inherent with two architectures, Rhythms' and
19 Covad's argument is without merit. First, for the reasons I described above, offering
20 splitters a line at a time is actually more cost efficient to both Ameritech Illinois and the
21 CLEC than offering splitters a shelf at a time. Moreover, Ameritech Illinois must protect
22 its most valued asset and that is the central office space, which includes frame space.
23 Providing CLECS with options of shelf at a time and line at a time will result in more
24 cabling and more blocks on Ameritech Illinois already congested frames. Third, splitter

1 technology is in its infancy and Ameritech Illinois will not recover its initial costs for
2 providing line at a time splitters if and when CLECs begin implementing new
3 technologies into their networks. If having a shelf dedicated to a CLEC is the preferred
4 option, Ameritech Illinois urges the Commission to require CLECs provide that
5 functionality to themselves.

6
7 Q. DOES AMERITECH ILLINOIS HAVE OTHER OBJECTIONS TO RHYTHMS
8 AND COVAD'S MENU APPROACH?

9
10 Yes. Ameritech Illinois also objects to Rhythms' and Covad's proposal which authorizes
11 CLECs to direct where Ameritech Illinois-owned splitters are to be located in the central
12 office. As stated above, Ameritech Illinois proposes that where the CLEC owns the
13 splitter, and physically collocates, splitters shall be installed in the CLEC's collocation
14 arrangement area (whether caged or cageless), consistent with Ameritech Illinois'
15 collocation tariff. When the CLEC is virtually collocated, Ameritech Illinois will install,
16 provision and maintain splitters under the terms of virtual collocation. Additionally,
17 where Ameritech Illinois owns the splitter, Ameritech Illinois will determine where such
18 splitters will be located in each central office.

19 Q. RHYTHMS AND COVAD, HOWEVER, ARGUE THAT IT IS MORE
20 EFFICIENT TO LOCATE SPLITTERS ON THE MAIN DISTRIBUTION
21 FRAME. HOW DO YOU RESPOND? (Covad Ex. 2.0 at 5, 14 (Zulevic); Covad/
22 Rhythms Ex. 2.0 at 15 (Riolo))

23
24 I disagree. Rhythms and Covad claim that locating splitters in the collocation space is
25 less efficient then locating the splitters on the main distribution frame because longer tie

1 cables are required. This, the CLECs argue, can result in increased costs, increased
2 opportunities for network failure and additional provisioning work. The frame mounted
3 splitters that Rhythms and Covad claim are efficient can only provision a maximum of
4 16 lines. This splitter is slightly larger than a 100 pair connecting block which is what
5 ILECs mount on frames as opposed to equipment. If Ameritech Illinois were to mount
6 these 16 line splitters so that CLECs could avoid paying for tie cabling, Ameritech
7 Illinois would consume twice the frame space, (6 blocks to 3 blocks) that Ameritech
8 Illinois can provision. None of the other ILECs have plans to deploy this type of splitter
9 ubiquitously, if at all, in their networks. In fact, only 25 such blocks have even been
10 shipped from the manufacturer through May 23, 2000 and those shipments are being sent
11 to U.S. West. Bell South is buying no 16 line splitters. Ameritech Illinois will locate the
12 splitters in a common area accessible to CLECs. This designation allows the CLECs the
13 access point at the splitter that is required in the *Line Sharing Order*.

14
15 Q. RHYTHMS AND COVAD ALSO SUGGEST THAT THE FCC, IN ITS *LINE*
16 *SHARING ORDER*, RECOMMENDED LOCATING SPLITTERS ON THE MAIN
17 DISTRIBUTION FRAME. HOW DO YOU RESPOND? (Covad Ex. 2.0 at 6
18 (Zulevic)).

19
20 A. Paragraph 113 of the order reads: "This splitter will likely be installed between the
21 MDF and the other central office equipment". Also, in Paragraph 104 the FCC explains
22 the cabling arrangements as follows "The first approach is to cable the high frequency
23 band directly to the DSLAM, and the second is to cable it (the high frequency band) to
24 another MDF location (or to an intermediate distribution frame (IDF) location and then

1 on to the DSLAM." It is clear that the recommended approach as set out in the Line
2 Sharing order is to utilize cabling to connect the splitters to the MDF/IDF and not to
3 mount splitters directly on the frames.

4
5 Q. RHYTHMS AND COVAD EXPRESS CONCERN THAT PLACING THE
6 SPLITTERS IN THE COMMON COLLOCATION AREA WILL REDUCE THE
7 AMOUNT OF AVAILABLE EFFICIENT SPACE FOR CLECS TO
8 COLLOCATE. PLEASE RESPOND. (Covad Ex. 2.0 at 15 (Zulevic)).
9

10 A. The Line Sharing Order requires Ameritech Illinois to provide the CLECs with test
11 access at the splitter. Ameritech Illinois will therefore place splitters in common areas
12 accessible to CLECs. If no common area exists, Ameritech Illinois will place splitters
13 within its equipment line-up in an area as close to the MDF/IDF, space providing, as
14 possible. However, if those circumstances arise, Ameritech Illinois will perform all
15 testing on behalf of the CLECs. Ameritech Illinois manages all space in its central
16 offices in an efficient manner and it is not cost efficient to do otherwise, whether
17 common space or space reserved for central offices.

18
19 Q. HOW DO YOU RESPOND TO RHYTHMS' AND COVAD'S ARGUMENT THAT
20 IT WILL HAVE TO RELY ON AMERITECH ILLINOIS FOR CAPACITY
21 MANAGEMENT OF THE SPLITTER IF AMERITECH ILLINOIS DOES NOT
22 OFFER SPLITTERS A SHELF AT A TIME? (Covad Ex. 2.0 at 15 (Zulevic);
23 Covad Ex. 1.0 at 16 (Moya)).
24

25 A. As explained in my testimony, Rhythms is supplying the vast majority of its own splitters
26 and as such will not "be relying" on Ameritech Illinois for capacity management.
27 Covad has the same options available, i.e., provide their own splitter functionality. In

1 any event, Ameritech Illinois has developed a capacity management program to provide
2 Ameritech Illinois management with usage reports and triggers such that additional
3 splitter equipment can be deployed well in advance of exhaust. To allay CLECs
4 concerns, Ameritech Illinois offers in its contract a provision for CLECs who have NOT
5 provided forecasts in requested central offices, to have a provisioning interval 10 days
6 beyond the installation equipment date. This provision will ensure that those CLECs
7 who have forecasted splitters will have those splitters available to them and those CLECs
8 who have not forecasted splitters will not be able to consume all available splitters but
9 must wait for equipment installation, if required, to meet their demand.

10

11 ISSUE 3:

12

13 Q. DESCRIBE AMERITECH ILLINOIS' POSITION WITH RESPECT TO
14 AUGMENT INTERVALS.

15

16 The Commission is well aware that in Ameritech Illinois, CLECs provide all cabling,
17 whether initial cabling or augments to existing cabling under normal collocation tariffs.

18 The CLECs know their business plans, are aware of any needs to augment their cabling
19 arrangements and have had the opportunity to install its cabling arrangement.

20 Additionally, all CLECs have been provided the schedule that Ameritech Illinois plans to
21 have Ameritech Illinois splitters installed by central office to use in their planning.

22

23 Q. RHYTHMS' AND COVAD'S PROPOSAL REQUIRES ^{AMERITECH ILLINOIS} SWBT TO PROVIDE
24 COLLOCATION AUGMENTS IN 30 DAYS. IS THIS REQUIRED BY THE
25 CURRENT COMMISSION APPROVED COLLOCATION TARIFF AND CAN

Ameritech ILLINOIS

~~SWBT~~ MEET SUCH INTERVALS?

1
2 A. No. The collocation tariff does not require the such intervals for augments. And, as
3 stated in the pervious answer, Ameritech Illinois has procedures in place for the CLECs
4 to provide their cabling requirements. The CLECs make no justification why the
5 commission-approved intervals and processes should be circumvented for line sharing.
6 Additionally, collocation terms and conditions go beyond the stated purpose of the line
7 sharing arbitration proceedings. Collocation is not line sharing and should not be
8 brought into these proceedings. Rather, the rates, terms and conditions, which apply for
9 collocation today, should also apply in the line sharing environment.

10 Q. HAS AMERITECH ILLINOIS AGREED TO HELP CLECS WITH SHORTENED
11 INTERVALS AS PART OF THE COLLABORATIVE TRIAL?

12 A. As explained above, Ameritech Illinois does not provide cable augments to CLECs,
13 rather cable augments are under the complete control of the CLECs. However,
14 Ameritech Illinois has provided a 30 day interval if CLECs wish to reuse existing cabling
15 and dedicate that cabling for line sharing. Upon receipt of a complete and correct
16 collocation application, Ameritech Illinois will redesignate CLECs existing cabling in
17 Ameritech's Illinois databases and will commit to providing that service within 30 days
18 of the receipt of a correct and complete application. Ameritech Illinois has waived
19 application fees with respect to this request.

20 ISSUE 4:

21 Q. DESCRIBE AMERITECH ILLINOIS' POSITION WITH RESPECT TO ACCESS

1 TO THE SHARED LOOP FOR TESTING PURPOSES.

2 A. Rhythms and Covad argue that Ameritech Illinois should be required to provide CLECs
3 with direct access to the shared physical loop for testing purposes at any technically
4 feasible point. Ameritech Illinois disagrees.

5 All CLECs are given parity in testing with Ameritech Illinois or its data affiliate. CLECs
6 will have test access to the splitters they own twenty-four hours a day, seven days a
7 week. CLECs shall have direct access to Ameritech Illinois-owned splitters when those
8 splitters are located in common areas. CLECs will have test access on a non-intrusive
9 basis only when physically testing at the splitter card. However, CLECs will not have
10 direct access to Ameritech Illinois-owned splitters if those splitters are installed outside
11 of the common area. Most offices in Illinois will have the Ameritech Illinois-owned
12 splitters installed in these common areas and CLECs will have 7 x 24 test access at the
13 splitter. Such testing can be done without affecting voice services or other data CLEC's
14 services. Since Ameritech Illinois is proposing to offer the splitter a line at a time,
15 multiple CLECs will share a single line card (presently four lines per card, twenty-four
16 cards per shelf). Any trouble isolation attributed to one card could result in service
17 disruption to the other three lines provisioned through the same card. Therefore,
18 Ameritech Illinois should be responsible for maintaining Ameritech Illinois owned
19 splitters.

20 Ameritech Illinois will permit intrusive testing under certain terms and conditions. First,

1 a CLEC utilizing the high frequency portion of the loop (HFPL) may perform intrusive
2 mechanized loop testing when the CLEC has established data service on the HFPL and,
3 prior to engaging in such testing, informs the end user customer that the testing will
4 interrupt both the data and voice telephone services served by that line and secures the
5 end user customer's permission to perform such testing. Second, the CLEC must assume
6 any and all liability for any such intrusive testing it performs, including the payment of
7 all costs associated with any damage, service interruption, or other degradation or
8 damage to Ameritech Illinois' facilities, and also must release, defend and indemnify
9 Ameritech Illinois, and hold Ameritech Illinois harmless, from any claims for loss or
10 damages, including but not limited to direct, indirect or consequential damages, made
11 against Ameritech Illinois by any end user customer, telecommunications service
12 provider or telecommunications user relating to such testing by the CLEC. Absent such
13 terms, if the CLEC believes that intrusive testing is necessary as a result of physical fault
14 troubles on the loop, the CLEC or end user should refer these troubles to Ameritech
15 Illinois to test, verify, and clear if necessary.

16 It is notable that Ameritech Illinois is also looking at ways to provide remote test access
17 to the high frequency portion of the loop and has shared those plans with the CLECs at
18 the collaborative sessions. While no decision has been reached to purchase this test
19 system, Ameritech Illinois will provide all CLECs test access on a non-discriminatory
20 basis should Ameritech Illinois decide to purchase the system.

1 To recap, CLECs will have test access opportunities at the splitter, will have access to
2 Ameritech Illinois remote test access vehicle, MLT in addition to CLECs own ability to
3 perform trouble isolation through normal internet service provider capabilities, i.e.,
4 "pinging the modem", testing at their DSLAM and finally, testing at the customer's
5 premise at the Network Interface Device.

6 Q. RHYTHMS AND COVAD, HOWEVER, ARGUE THAT THEY SHOULD HAVE
7 DIRECT PHYSICAL ACCESS TO THE LOOP AT THE MAIN DISTRIBUTION
8 FRAME. HOW DO YOU RESPOND?

9 A. Rhythms and Covad should not be allowed access to Ameritech Illinois main or
10 intermediate distribution frames for test access purposes, or any other purpose. This kind
11 of access would deny Ameritech Illinois the ability to protect its own equipment, a right
12 provided by the FCC in its Advanced Service Order, FCC 99-48, Paragraph 48: "We
13 agree with commenting incumbent LECs that protection of their equipment is crucial to
14 the incumbents' own ability of offer services to their customers." Ameritech Illinois has
15 provided CLECs with the test access in accordance with the Line Sharing Order. See
16 Appendix B, Section 51.319, paragraph (h) (7)(I) "Incumbent LECS must provide, on a
17 nondiscriminatory basis, physical loop test access points to requesting carriers at the
18 splitter . . . " At a minimum, Ameritech Illinois has met this condition by providing test
19 access at a point that the CLECs can verify their signals from their DSLAM through the
20 splitter frame wiring and out the splitter destined to the end user and the internet service
21 provider. However, Ameritech Illinois went beyond these minimum requirements of

1 "test access at the splitter" and has provided CLECs with access to Ameritech Illinois
2 Mechanized Loop Testing or MLT. CLECs had long requested MLT access during the
3 collaborative sessions but Ameritech Illinois did not at first agree to provide. Through
4 both parties negotiating the terms and agreements, Ameritech Illinois has provided MLT
5 access for the purposes of CLEC testing the physical loop. Such MLT access is being
6 provided to CLECs at no charge. Notwithstanding the capabilities that CLECs now have
7 to test not only the high frequency portion of the loop AND the narrowband or low
8 frequency portion of the loop, the CLECs now claim they need access to Ameritech
9 Illinois frames for further testing presumably to ensure that Ameritech Illinois has wired
10 their circuits correctly. CLECs will not have any information as to where these circuits
11 are even wired out on the frames and even if they had this information, Ameritech Illinois
12 contends that any reported trouble and/or suspicion of trouble in Ameritech Illinois'
13 network should be referred to Ameritech Illinois for resolution of network troubles.

14 **ISSUE 5:**

15 **Q. DESCRIBE AMERITECH ILLINOIS' POSITION WITH RESPECT TO**
16 **PROVISIONING AND INSTALLATION INTERVALS.**

17 **A.** Where no conditioning is requested, the provisioning and installation interval for orders
18 of 1-20 loops per order or per end-user location should be five business days. For orders
19 of more than 20 loops per order or per end user location, where no conditioning is
20 requested, the provisioning and installation interval should be fifteen business days or as
21 agreed by the parties. Where conditioning is requested, the provisioning and installation

1 interval for orders of 1-20 loops per order or per end-user location should be ten business
2 days. Orders of more than twenty loops per order or per end user location, where
3 conditioning is requested, should have a provisioning and installation interval as agreed
4 by the parties. Ameritech Illinois will provide CLECs with these provisioning and
5 installation intervals or parity with the intervals realized for Ameritech Illinois' data
6 affiliate, whichever is less. The parity requirement levels the playing field for all CLECs
7 and ensure Ameritech Illinois will have every incentive to improve its process to
8 provision as quickly as possible for all CLECs.

9 These intervals are entirely reasonable based on the amount of work required to provision
10 and install the HFPL UNE. For example, in the circumstance where loop conditioning is
11 required (for which Ameritech Illinois has proposed a 10 business-day interval), an
12 engineer must first issue an order directing a technician to actually perform the
13 conditioning work. The technician must then be dispatched to the field. These
14 technicians are not dedicated solely to the performance of loop conditioning; they have
15 other responsibilities as well and are not generally available to instantaneously condition
16 a loop for a particular requesting CLEC. (*In theory*, of course, Ameritech Illinois could
17 provide a dedicated technician to condition lines for each CLEC on a moment's notice,
18 but the cost would be prohibitive.)

19 Once the technician is able to schedule the field work, he or she may encounter
20 circumstances that make the task difficult to accomplish in an abbreviated time frame.

1 For example, some loop conditioning will require the technician to venture into a
2 manhole. Occasionally, the technician will discover that water is present in the manhole;
3 when this occurs, the water must be pumped out. On rare occasions, there may be a need
4 for the technician to use supplemental air tanks to work on pressurized cables.

5 Ameritech Illinois' proposed language offers the CLECs provisioning and installation in
6 the same ordering and provisioning time intervals as Ameritech Illinois provides its data
7 affiliate. This is all that is required by the FCC; the *Line Sharing Order* provides in
8 relevant part:

9 Specifically, we expect that incumbent LECs will implement ordering and
10 provisioning mechanisms and interfaces that provide competitive LECs with the
11 ability to obtain access to the high frequency portion of the loop in the same
12 ordering and provisioning time intervals that the incumbent provides for its own
13 xDSL-based service.⁹

14 Ameritech Illinois' language therefore meets the requirements of the *Line Sharing Order*
15 and provides the CLECs with rapid, manageable time frames for provisioning and
16 installation. Additionally, the intervals proposed by Ameritech Illinois are the same as
17 wholesale provisioning intervals already approved. For example, the permissible interval
18 for an order of 1-20 DSL-capable loops where no conditioning is required is 5 business
19 days.

20 Q. COVAD/RHYTHMS PROPOSAL ADVANCES CERTAIN PROVISIONING AND

⁹ *Line Sharing Order*, ¶ 107 (footnote omitted).